

**FILED**  
UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

MAR 16 2020

MITCHELL R. ELFERS  
CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**TRUDY MARTINEZ,**

Defendant.

CRIMINAL NO

20-972 WJ

Count 1: 18 U.S.C. §§ 1153 and  
1112(a): Voluntary Manslaughter;

Count 2: 18 U.S.C. § 924(c)(1)(A)(iii):  
Using and Carrying, a Firearm During and  
in Relation to a Crime of Violence,  
and Possessing a Firearm in Furtherance of  
Such Crime; Discharging Said Firearm.

**INFORMATION**

The United States Attorney charges:

Count 1

On or about April 26, 2019, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **TRUDY MARTINEZ**, an Indian, upon sudden quarrel and therefore without malice, unlawfully killed Jane Doe.

In violation of 18 U.S.C. §§ 1153 and 1112(a).

Count 2

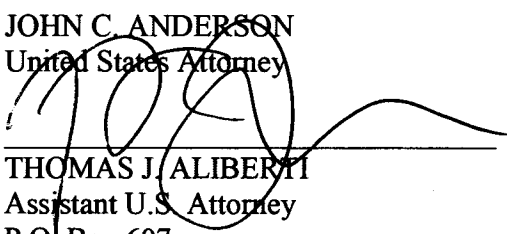
On or about April 26, 2019, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **TRUDY MARTINEZ**, knowingly used, and carried a firearm, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, voluntary manslaughter as charged in Count 1 of this information, and in furtherance of such crime, and the firearm was discharged.

In violation of 18 U.S.C. § 924(c)(1)(A)(iii).

**FORFEITURE ALLEGATIONS**

Upon conviction of the offense alleged in this Information, the defendant, **TRUDY MARTINEZ**, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) any interest she may have in an AR-15 Bushmaster Model BK5037442 rifle with the serial number XM15-E25 and twenty (20) rounds of 5.56mm Winchester brand ammunition.

JOHN C. ANDERSON  
United States Attorney



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